

**Scianni, Melissa**

---

**From:** Quast, Sylvia  
**Sent:** Friday, December 19, 2014 3:09 PM  
**To:** Kao, Jessica  
**Subject:** FW: Implications of legal standards applicable to determining RHA and CWA jurisdiction in March 25, 2014 Memorandum by Earl Stockdale, ACOE Chief Counsel.

Let's talk.

---

**From:** Kermish, Laurie  
**Sent:** Friday, December 19, 2014 12:38 PM  
**To:** Quast, Sylvia  
**Cc:** Campbell, Rich  
**Subject:** Implications of legal standards applicable to determining RHA and CWA jurisdiction in March 25, 2014 Memorandum by Earl Stockdale, ACOE Chief Counsel.

ATTORNEY-CLIENT COMMUNICATION/WORK PRODUCT

Sylvia, is this what you think RA needs for discussion? Let me and Rich know if you want more.

[REDACTED]

[REDACTED]

[REDACTED] B5 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Laurie Kermish  
CWA Section Chief  
Office of Regional Counsel (ORC-2)  
U.S. EPA, Region 9  
75 Hawthorne St.  
San Francisco, CA 94105  
(415) 972-3917  
(415) 947-3570 (fax)  
[kermish.laurie@epa.gov](mailto:kermish.laurie@epa.gov)